Environmental sustainability policy

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Date	Version	Description	Status
July 2025	1.0	First edition of the Environmental Sustainability Policy of Mediclinics S.A.	Approved
October 2026	2.0	Regulatory, Climate, Circularity, Product and Supply Chain Updates.	Approved

Introduction

Founded in Barcelona in 1974, Mediclinics has established itself as a company specializing in the design, manufacture and marketing of equipment for public and collective-use washrooms, integrating innovation, quality, safety and sustainability as core principles of its business activities.

This Environmental Sustainability Policy establishes the corporate framework for preventing, reducing and managing the environmental impacts associated with our operations, products and value chain, in accordance with applicable legislation and the environmental commitments publicly undertaken by the company.

Mediclinics is committed to environmental management based on data and continuous improvement, with particular focus on climate action, energy efficiency, the responsible use of resources, the circular economy, ecodesign, pollution prevention, and the proper management of substances, waste and packaging. The implementation of this Policy shall not compromise the quality, functionality or safety of our products.



Principles and general objectives

Mediclinics' environmental performance shall be guided by the following principles:

- **Regulatory Compliance and Prevention:** comply with applicable environmental and product legislation, anticipate relevant risks and prioritize preventive measures over corrective actions.
- **Measurable Objectives and Evidence:** establish verifiable environmental indicators and objectives, periodically review progress and support environmental claims with sufficient technical information.
- **Life Cycle Approach:** consider, where material, the impacts associated with product design, manufacturing, supply, use, maintenance and end of life.
- **Efficiency and Circularity:** reduce energy and raw material consumption, prevent waste and promote product durability, repairability, reuse, recyclability and material recovery.
- **Transparency and Continuous Improvement:** Communicate progress and limitations rigorously, avoiding environmental claims that may be misleading or insufficiently substantiated.
- **Shared Responsibility:** Integrate environmental criteria into procurement, product development, operations and supplier relationships, considering proportionality and Mediclinics' level of influence.

Scope

This Policy applies to MEDICLINICS, S.A. and its activities, sites, processes and products. Its principles shall also guide relationships with suppliers, subcontractors and other business partners where reasonable, considering the nature of the supply, the environmental risk and Mediclinics' ability to exert influence.

The Sustainability Department shall coordinate the implementation and monitoring of this Policy in collaboration with the departments responsible for Procurement, Quality, Operations, Engineering, Occupational Health and Safety, Compliance and other relevant functions. This Policy shall be interpreted in conjunction with the Supplier Code of Conduct, the Labor and Human Rights Policy, and all other applicable internal policies and procedures.

Commitments

Energy efficiency and climate change

Mediclinics recognizes the need to contribute to climate change mitigation and to progressively manage the climate-related risks and opportunities relevant to its business activities. To this end, the company undertakes the following commitments:

- **Measurement:** Calculate and update the corporate carbon footprint for Scopes 1 and 2 annually in accordance with recognized methodologies, using 2024 as the corporate base year, and progressively advance the identification and calculation of material Scope 3 categories.
- **2035 Target:** Maintain the corporate target of reducing Scope 1 and 2 GHG emissions by 63% by 2035 compared with the 2024 base year, in line with a climate pathway compatible with 1.5°C and with the methodological ambition of the Science Based Targets initiative (SBTi).
- **Energy Efficiency:** Prioritize measures to reduce electricity consumption and improve the efficiency of facilities, equipment and processes, incorporating energy efficiency criteria into investment decisions where relevant.
- **Renewable Energy:** Gradually increase the use of or procurement of energy from renewable sources where technically and economically feasible.
- **Product and Life Cycle:** Use life cycle assessments (LCAs) or other appropriate methodologies to identify significant environmental impacts of products and guide impact reduction, ecodesign and improvement measures.
- **Climate Risks:** Identify, where material, physical and transition risks that may affect facilities, operations, supply chains or business continuity, and integrate reasonable adaptation and resilience measures.
- **Reporting:** Communicate key climate results and milestones consistently with the data actually calculated and the methodologies used.

Commitments

Circular Economy, Ecodesign and Waste Management

Mediclinics shall promote a progressively more circular model of resource production and consumption, applying the waste hierarchy and ecodesign criteria where they are materially relevant to its products and processes.

- **Raw Materials:** Promote the use of recycled, recyclable or lower-impact materials where technically feasible, without compromising product quality, safety, durability or conformity requirements.
- **Design for Circularity:** Incorporate criteria relating to durability, reliability, maintenance, repair, disassembly, component recovery and recyclability, considering the European sustainable ecodesign framework and the specific requirements applicable to each product category.
- **Waste:** Prevent waste generation, improve waste segregation at source and prioritize reuse, recycling and recovery over disposal, working with authorized waste managers and maintaining the required traceability.
- **Internal Targets:** Maintain the correct segregation at source of at least 90% of generated waste and a minimum recovery rate of 80% as management benchmarks, provided that the calculation methodology and the availability of waste managers allow these targets to be measured consistently.
- **Packaging:** Reduce unnecessary materials and empty space, improve recyclability and promote recycled content and reusable solutions where appropriate, while complying with the applicable requirements of Regulation (EU) 2025/40 on packaging and packaging waste.
- **Electrical and Electronic Equipment:** Facilitate appropriate end-of-life management, where applicable, and ensure compliance with legal obligations concerning waste electrical and electronic equipment.
- **Digitalization:** Reduce unnecessary consumption of paper and other consumables through secure and efficient digital processes.

Commitments

Water, Pollution, Biodiversity and substances

- **Water:** Identify significant water consumption, promote efficient use and prevent discharges or activities that could deteriorate water quality.
- **Pollution Prevention:** Implement measures to prevent or minimize air emissions, discharges, soil contamination, noise and other significant environmental impacts arising from operations.
- **Biodiversity and Soil:** Consider potential impacts on biodiversity, ecosystems and land use when undertaking new activities, making significant operational changes or taking procurement decisions, where a material risk exists.
- **Substances and Materials:** Control hazardous substances and substances of very high concern, and comply with REACH, RoHS and other substance restrictions where applicable, maintaining the required documentation and traceability.

Product, Safety and Supply Chain

- **Safety and Compliance:** Design and manufacture products that comply with applicable legislation and technical standards, including electrical, mechanical and thermal safety requirements and restrictions on hazardous substances.
- **Environmental Product Information:** Ensure that claims regarding efficiency, savings, recyclability, recycled content, carbon footprint or environmental benefits are clear, verifiable and supported by appropriate criteria, tests or methodologies.
- **Suppliers:** Integrate environmental and sustainability criteria into supplier selection, approval and evaluation processes, according to the risk and relevance of the supply. Specific supplier obligations shall be governed by the Supplier Code of Conduct, contracts and applicable technical requirements.
- **Information and Traceability:** Request, where reasonable, information on material composition, substances, origin, recycled content, packaging, emissions and other environmental data necessary to meet legal obligations, customer requirements or corporate commitments.

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Monitoring, Indicators and Continuous Improvement

The Sustainability Department shall coordinate the monitoring of this Policy and propose the indicators required to assess its implementation. Environmental performance shall be reviewed at least once a year, with the participation of the relevant departments where appropriate.

- maintain reasonable evidence of compliance with relevant environmental objectives, measurements and actions;
- review objectives when there are material changes in circumstances, legislation, strategy, technology or calculation methodologies;
- analyze significant deviations and, where appropriate, define corrective measures or improvement plans with assigned responsibilities and deadlines;
- formally review this Policy at least every two years, or earlier if significant regulatory, organizational or business changes occur;
- promote environmental training and awareness among employees whose roles have a significant impact on the company's environmental performance.

This Policy establishes a general corporate framework and does not replace the specific procedures, permits, assessments, records or controls required under applicable environmental, product or occupational health and safety legislation.

Reference Framework

- Paris Agreement and applicable European and Spanish climate change legislation.
- GHG Protocol and recognised methodologies for calculating greenhouse gas inventories.
- Regulation (EU) 2024/1781 on ecodesign requirements for sustainable products (ESPR), where applicable.
- Regulation (EU) 2025/40 on packaging and packaging waste (PPWR), applicable from 12 August 2026.
- REACH Regulation, the RoHS Directive and applicable legislation on waste electrical and electronic equipment (WEEE).
- Law 7/2022 on waste and contaminated soils for a circular economy, and its implementing regulations.
- United Nations Sustainable Development Goals (SDGs), the United Nations Global Compact, ISO 14001 and ISO 14040/14044 as reference frameworks, where appropriate.

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